

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>LATRELLE STRICKLIN,</b>	)	<b>Case No.</b>	FILED: JULY 30, 2008
	)		08CV4321
<b>Plaintiff,</b>	)	<b>Judge</b>	JUDGE DER-YEGHIAYAN
	)	<b>Magistrate Judge</b>	MAGISTRATE JUDGE SCHENKIER
<b>v.</b>	)		
	)		
<b>P.O. B.O. CHINCHILLA #9445,</b>	)	<b>Jury Demand</b>	PH
<b>P.O. A. LAGUNAS #9916, individually,</b>	)		
<b>and the CITY OF CHICAGO,</b>	)		
	)		
<b>Defendants.</b>	)		

**COMPLAINT**

NOW COMES the Plaintiff, LATRELLE STRICKLIN, by and through his attorneys,  
GREGORY E. KULIS and ASSOCIATES, and complaining against the Defendants, P.O.  
P.O. B.O. CHINCHILLA #9445, P.O. A. LAGUNAS #9916 and the CITY OF CHICAGO,  
individually, as follows:

**COUNT I - FALSE ARREST**

- 1) This action is brought pursuant to the laws of the United States Constitution, specifically, 42 U.S.C. §1983 and §1988, and the laws of the State of Illinois, to redress deprivations of the civil rights of the Plaintiff accomplished by acts and/or omissions of the Defendants committed under color of law.
- 2) Jurisdiction is based on Title 28 U.S.C. §1343 and §1331.
- 3) The Plaintiff, LATRELLE STRICKLIN, at all relevant times, was a United States citizen and permanent resident of the State of Illinois.
- 4) The Defendants, P.O. B.O. CHINCHILLA #9445 and P.O. A. LAGUNAS #9916,

were at all relevant times duly appointed police officers of the City of Chicago and at all relevant times were acting within their scope of employment and under color of law.

- 5) On or about January 22, 2008, the Plaintiff was standing in the vicinity of 940 N. Monticello in the City of Chicago, Illinois.
- 6) The Plaintiff was not committing a crime or breaking any laws.
- 7) The Defendants came upon the Plaintiff and took him into custody.
- 8) The Plaintiff was charged with numerous criminal charges under a different name they gave him.
- 9) The Defendants did not have probable cause to arrest the Plaintiff.
- 10) Said actions of Defendants, P.O. B.O. CHINCHILLA #9445 and P.O. A. LAGUNAS #9916, were intentional, willful and wanton.
- 11) Said actions of the Defendants, P.O. B.O. CHINCHILLA #9445 and P.O. A. LAGUNAS #9916, violated the Plaintiff's Fourth Amendment Rights and were in violation of said rights protected by 42 U.S.C. §1983.
- 12) As a direct and proximate consequence of said conduct of the Defendants, Plaintiff LATRELLE STRICKLIN suffered violations of his constitutional rights, monetary expense, fear, emotional distress, and pain and suffering.

WHEREFORE, the Plaintiff, LATRELLE STRICKLIN, prays for judgment against the Defendants, P.O. B.O. CHINCHILLA #9445 and P.O. A. LAGUNAS #9916, jointly and severally, in an amount in excess of TWENTY THOUSAND and 00/100 (\$20,000.00) DOLLARS compensatory damages and TEN THOUSAND and 00/100 (\$10,000.00) DOLLARS

punitive damages, in addition to attorney's fees and costs.

**COUNT II- CITY OF CHICAGO/INDEMNIFICATION**

1-9) The Plaintiff, LATRELLE STRICKLIN, hereby realleges and incorporates his allegations of paragraphs 1-9 of Count I as his respective allegations of paragraphs 1-9 of Count II as though fully set forth herein.

19) Illinois law provides that public entities are directed to pay any tort judgment for compensatory damages for which employees are liable within the scope of their employment activities.

20) Defendants P.O. B.O. CHINCHILLA #9445 and P.O. A. LAGUNAS #9916 are employees of the City of Chicago Police Department who acted within the scope of their employment in committing the misconduct described herein.

WHEREFORE, should Defendants P.O. B.O. CHINCHILLA #9445 and P.O. A. LAGUNAS #9916 be found liable for the acts alleged above, Defendants CITY OF CHICAGO would be liable to pay the Plaintiff any judgment obtained against said Defendants.

**COUNT III-MALICIOUS PRESECUTION**

1-7) The Plaintiff hereby realleges the allegations of paragraphs 3-9 of Count I as his respective allegations of paragraphs 1-7 of Count III as through fully set forth herein.

8) The Defendants proceeded to trial knowing that the criminal charges were false.

9) The Plaintiff was acquitted.

10) As a result of the actions of the Defendants, the Plaintiff suffered pain, anxiety, fear and monetary loss.

WHEREFORE, the Plaintiff, LATRELLE STRICKLIN, prays for judgment against the Defendants, P.O. B.O. CHINCHILLA #9445 and P.O. A. LAGUNAS #9916, jointly and severally, in an amount in excess of TWENTY THOUSAND and 00/100 (\$20,000.00) DOLLARS compensatory damages and TEN THOUSAND and 00/100 (\$10,000.00) DOLLARS punitive damages, in addition to attorney's fees and costs.

**JURY DEMAND**

The Plaintiff, LATRELLE STRICKLIN, requests a trial by jury.

Respectfully submitted,

/s/ Gregory E. Kulis  
GREGORY E. KULIS AND ASSOCIATES

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